Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WILLIAM F. WINGATE,

Plaintiff,

v.

CITY OF SEATTLE, SEATTLE POLICE DEPARTMENT AND CYNTHIA WHITLATCH, in her official and individual capacities,

Defendants.

No. 2:15-cv-00822-RAJ

PLAINTIFF'S ADDITIONAL PROPOSED VOIR DIRE FOR THE COURT

1. Do you, or any of your family or friends, work for the Seattle Police Department? If yes, would this render you incapable of ruling fairly when the defendant worked for the Seattle Police Department?
2. Do any of you believe that when a police officer orders you to do something that you must comply?
3. This case alleges racial discrimination on the part of the defendant. Is there anything about one person accusing the other of racial discrimination that makes you unwilling to sit on this jury?

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4. Have you ever been in a situation where you believe that one person was treating another person with racial bias?
5. Do you think it is important to include African-Americans on the jury where an African-American has alleged racial bias?
6. Do you think the racial make-up of the jury will affect your ability to fairly deliberate?
7. Has anyone ever heard the adage don't judge a book by it's cover?
8. Have any of you ever been judged by your physical appearance? Like your hair color, your weight, your neighborhood, or your job?
9. Have you ever had racially prejudiced thoughts about another person, even if those thoughts made you feel uncomfortable or uneasy?
10. Have you ever thought that you were the target of racial prejudice?
11. Does anyone think that racism against African-American people is a thing of the past?
12. Does anyone here think that law enforcement officers treat African-Americans differently then they do white Americans?
13. Do any of you believe that African-Americans commit more crimes then white Americans?

Dated this 8th day of August 2016.

s/ Vonda M. Sargent
Vonda M. Sargent
WSBA No. 24552
Attorney for Plaintiff

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